

Leah Farrell (Bar No. 13696)
John Mejia (Bar No. 13965)
AMERICAN CIVIL LIBERTIES UNION OF
UTAH FOUNDATION, INC.
355 N. 300 W.
Salt Lake City, UT 84103
(801) 521-9862
(801) 532-2850 (fax)
lfarrell@acluutah.org
jmejia@acluutah.org

*Attorneys for Plaintiff
Planned Parenthood Association of Utah*

**Admitted pro hac vice*

Julie Murray*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005
(202) 803-4045
(202) 296-3480 (fax)
julie.murray@ppfa.org

Jennifer Sandman*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
123 William Street, 9th Floor
New York, NY 10038
(212) 261-4584
(212) 247-6811 (fax)
jennifer.sandman@ppfa.org

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

PLANNED PARENTHOOD
ASSOCIATION OF UTAH, on behalf of
itself and its patients, physicians, and staff,

Plaintiff,

v.

JOSEPH MINER, in his official capacity as
Executive Director of the Utah Department
of Health, *et al.*,

Defendants.

Case No. 2:19-cv-00238

**JOINT MOTION FOR ENTRY OF AN
AMENDED AND STIPULATED
PROTECTIVE ORDER**

Plaintiff and Defendants, by and through their respective counsel, stipulate and jointly move the Court to enter the attached protective order for discovery in this case. It is the parties' intent that this protective order shall supersede the Standard Protective Order in effect under DUCivR 26-2.

Respectfully submitted,

/s/ Julie Murray

Julie Murray*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005
(202) 803-4045
(202) 296-3480 (fax)
julie.murray@ppfa.org

Jennifer Sandman*
PLANNED PARENTHOOD FEDERATION
OF AMERICA
123 William Street, 9th Floor
New York, NY 10038
(212) 261-4584
(212) 247-6811 (fax)
jennifer.sandman@ppfa.org

Dated: August 12, 2019

Leah Farrell (Bar No. 13696)
John Mejia (Bar No. 13965)
AMERICAN CIVIL LIBERTIES UNION OF
UTAH FOUNDATION, INC.
355 N. 300 W.
Salt Lake City, UT 84103
(801) 521-9862
(801) 532-2850 (fax)
lfarrell@acluutah.org
jmejia@acluutah.org

*Attorneys for Plaintiff Planned
Parenthood Association of Utah*

** admitted pro hac vice*

Approved as to form:

DAVID N. WOLF (6688)

s/ Lance Sorenson

LANCE SORENSON (10684)

Assistant Utah Attorneys General

OFFICE OF THE UTAH ATTORNEY GENERAL

160 East 300 South, Sixth Floor P.O. Box 140856

Salt Lake City, Utah 84114-0856

Telephone: (801) 366-0100

Facsimile: (801) 366-0101

E-mail: dnwolf@agutah.gov

E-mail: lancesorenson@agutah.gov

Counsel for State Defendants

SIM GILL

Salt Lake County District Attorney

s/ Darcy M. Goddard

DARCY M. GODDARD

Deputy District Attorney Counsel for Salt Lake County

District Attorney Sim Gill

E-mail: DGoddard@slco.org

CERTIFICATE OF SERVICE

I certify that on August 12, 2019, a true and correct copy of the foregoing **JOINT MOTION FOR ENTRY OF AN AMENDED AND STIPULATED PROTECTIVE ORDER** was served on counsel for Defendants via e-mail:

David N. Wolf

dnwolf@agutah.gov

Lance Sorenson

lancesorenson@agutah.gov

Assistant Utah Attorneys General

Office of the Utah Attorney General

Darcy Goddard

Office of the Salt County District Attorney

Dgoddard@slco.org

/s/ Julie Murray

Julie Murray

PLANNED PARENTHOOD FEDERATION
OF AMERICA

1110 Vermont Avenue, NW, Suite 300
Washington, DC 20005

(202) 803-4045

(202) 296-3480 (fax)

julie.murray@ppfa.org